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BDA Proposes Additional Issue Price Safe Harbors.

On December 9, 2015, the Bond Dealers of America (BDA) submitted an additional comment letter to the IRS and U.S. Treasury Department as a follow up to their testimony at the IRS issue price public hearing on October 28, 2015. In the letter, BDA recommends that the IRS and U.S. Treasury Department create an issue price safe harbor for competitive deals, so that the issue price is established if 25 percent of the total issue of bonds is sold at the initial offering price. In negotiated transactions, BDA proposes that the issue price would be established if 50 percent of the bonds underwritten were sold at the initial offering price. BDA withdrew its earlier suggestion that a safe harbor for competitive bids be established for a minimum number of bids received.

A copy of the BDA comment letter is available [here](#).